

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	
	§	Chapter 11
FREE SPEECH SYSTEMS, LLC,	§	
	§	Bankruptcy Case No. 22-60043
Debtor.	§	

Elevated Solutions Group, LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adversary No. 24-03038
	§	
Free Speech Systems, LLC, CMC Consulting,	§	
LLC	§	
	§	
Defendants.	§	
	§	
	§	
	§	
	§	

**ANSWER OF FREE SPEECH SYSTEMS, LLC TO CROSS-CLAIMS FILED BY CMC
CONSULTING, LLC**

Free Speech Systems, LLC (“FSS”) respectfully shows:

Admissions & Denials

1. FSS admits the allegations in the following paragraphs: 73-78, 79 (except that defendant lacks knowledge as to the first sentence, which (for only that reason) is therefore denied) , 80 (except FSS lacks knowledge as to what was known to cross-plaintiff and the degree to which the November 2022 agreement modified earlier agreements, which is therefore denied), the last two sentences of 81, and 82-85.

2. FSS lacks sufficient knowledge to admit or deny the allegations in the first three sentences of paragraph 81. (However, on information and belief, the allegations in the first three sentences are accurate.) At the moment,¹ FSS lacks sufficient knowledge to admit or deny the allegations in the fourth sentence of paragraph 81. For these reasons, the allegations are denied.

3. All allegations not addressed above are denied.

Prayer

FSS prays that the Court enter a judgment in favor of cross-defendant consistent with the above.

Respectfully submitted:

O'CONNORWECHSLER PLLC

By: /s/ Annie Catmull

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ATTORNEYS FOR FREE SPEECH SYSTEMS,
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Certificate of Service

I certify that On May 6, 2024, the attached answer was served via the Court's ECF notification system to all registered parties who have made an appearance in this case.

By: /s/ Annie Catmull

Annie Catmull

¹ FSS anticipates that this allegation will be admitted but is waiting to confirm the allegation, including by communicating with FSS's counsel who withdrew in March of 2024.